

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:) Case No. 08-35653 (KRH)
)
CIRCUIT CITY STORES, INC., *et al.*,) Chapter 11
)
Debtors.) (Jointly Administered)
)

**MOTION PURSUANT TO LOCAL BANKRUPTCY
RULE 2090-1(E)(2) FOR ADMISSION *PRO HAC VICE***

Richard E. Hagerty (“Movant”), a member in good standing of the Bar of the Commonwealth of Virginia, and an attorney admitted to practice before the United States District Court for the Eastern District of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia, hereby moves this Court for the entry of an Order permitting Stuart A. Laven, Jr., a partner with the law firm of Benesch, Friedlander, Coplan & Aronoff LLP, 200 Public Square, Suite 2300, Cleveland, Ohio 44114-2378, to appear and practice *pro hac vice* before the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, on behalf of Northcliff Residual Parcel 4 LLC, a creditor and interested party in the above-referenced bankruptcy proceeding, pursuant to Local Bankruptcy Rule 2090-1(E)(2). In support of this Motion, Movant states as follows:

1. Stuart A. Laven is a member in good standing of the Ohio State Bar and the New York State Bar, and is admitted to practice before the United States District Courts and the

Richard E. Hagerty
VSB No. 47673
Attorney for Northcliff Residual Parcel 4 LLC
TROUTMAN SANDERS LLP
1660 International Drive, Suite 600
McLean, Virginia 22102
703-734-4326
703-448-6520 (facsimile)
richard.hagerty@troutmansanders.com

United States Bankruptcy Courts for the Northern District of Ohio, the Southern District of Ohio, the Southern District of New York, the Eastern District of New York, the Western District of New York and the Northern District of New York. There are no disciplinary proceedings pending in any court against Stuart A. Laven.

2. Movant requests that this Court grant this Motion so that Stuart A. Laven, Jr. may participate, appear and be heard in matters involving Northcliff Residual Parcel 4 LLC in this case.

3. Pursuant to Local Bankruptcy Rule 9013-1(E), and given the administrative nature of the relief requested herein, Movant requests that the requirement that all motions be accompanied by a written memorandum of law be waived.

WHEREFORE, Movant respectfully requests that the Court enter an Order permitting Stuart A. Laven, Jr. to appear *pro hac vice* in association with Movant as counsel for Northcliff Residual Parcel 4 LLC in these cases; and granting such other and further relief as the Court deems just and proper.

Dated: August 17, 2012

/s/ Richard E. Hagerty

Richard E. Hagerty (VSB #47673)
TROUTMAN SANDERS LLP
1660 International Drive, Suite 600
McLean, VA 22102
(703) 734-4326
(703) 448-6520 (facsimile)
richard.hagerty@troutmansanders.com

/s/ Stuart A. Laven, Jr.

Stuart A. Laven, Jr. (OBR #0071110)
BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP
200 Public Square
Suite 2300
Cleveland, OH 44114-2378
(216) 363-4500
(216) 363-4588 (Facsimile)
slaven@beneschlaw.com

Attorneys for Northcliff Residual Parcel 4 LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of August, 2012, I caused a copy of the foregoing to be served on the following registered persons via the Court's CM/ECF System, and on all other persons who have requested notice in these proceedings:

Lynn L. Tavenner, Esq.
Paula S. Beran, Esq.
TAVENNER & BERAN, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219

Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
(admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Boulevard
Los Angeles, California 90067-4100

Counsel to the Liquidating Trustee

/s/ Richard E. Hagerty
Richard E. Hagerty